

# **EXHIBIT I**

From : anthony@fiorentinolaw.net  
To : simonettl@gtlaw.com  
Sent : 8/18/2022 4:06PM  
Subject : Follow up on Rule 37 conference  
Hello Lisa,

Thanks for meeting with us today. This email is to follow up on our discussion involving the class definitions.

The case management order states that discovery-related motions may be filed only after a telephone conference with the Court, and that each party shall submit a letter (3 pages or less) outlining the nature of the dispute.

We intend to request a phone conference. Could you please provide your availability next week (in Eastern time)?

Before meeting with the judge, I would like to confirm the range of disputed issues. Based on our call, it appears that the parties agree that Classes 1 and 4 are based on the original allegations, but Defendants believe Classes 2,3,5, and 6 are not. Please confirm that this is your position.

Also, based on the consensus regarding Classes 1 and 4, please let us know if your clients agree to proceed with running search queries on Classes 1 and 4, and if so, when we might expect to receive the results.

As a courtesy, I have pasted the link to local rule 5.1, which contains very specific formatting requirements for all documents submitted to the court (including our letters).

<https://www.pamd.uscourts.gov/sites/pamd/files/LR120114.pdf>

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
PENNSYLVANIA RULES OF COURT - Middle District of Pennsylvania |  
United States District Court

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA RULES OF COURT AS  
AMENDED 1983, 1985, January and November 1988, December 1993, May 1995, April

[www.pamd.uscourts.gov](http://www.pamd.uscourts.gov)

Tony Fiorentino  
Fiorentino Law Offices  
432 N. Clark St., Suite 202  
Chicago, IL 60654